

Without conceding the propriety of the aforesaid rejections, to expedite prosecution, Claims 1-79 have been cancelled. Accordingly, Applicant submits that the foregoing rejections are moot.

Newly-presented Claims 80-93 have been added to provide Applicant with an additional scope of protection. Applicant submits that support for newly-presented Claims 80-93 can be found at least at, for example, Figures 25-27 and corresponding portions of the specification, and therefore no new matter has been added.

In accordance with the present invention as recited in independent Claim 80, the present invention relates to an image reproduction control apparatus including storage, reading, and reproduction control sections. The storage unit uses a recording medium to store a plurality of reproducible images and a reproduction instruction file containing at least one file name specifying at least one image to be reproduced, the reproduction instruction file being separate from the plurality of images. The reading section reads the reproduction instruction file stored in the recording medium. The reproduction control section controls reproduction of the reproducible images by reading the image specified by the reproduction instruction file read by said reading section, wherein reproduction is not performed for a particular image of the at least one image to be reproduced if said reproduction control section determines that the particular image to be reproduced is not recorded in the recording medium, and wherein if a next reproducible image is specified by the reproduction instruction file and said reproduction control section determines that the next reproducible image is recorded in the recording medium, the next reproducible image is reproduced.

As a result, only when the image instructed by the reproduction control file is specified (i.e., the image is to be reproduced), is the reproduction process performed. In other

words, if the image to be reproduced is not recorded on the medium, the instruction to reproduce it is skipped. Thus, the problems associated with the content of the reproduction control file not coordinated with the image data are addressed.

Independent Claims 86 and 87 correspond generally to Claim 80 and recite similar features in method and computer readable code forms, respectively.

In accordance with the present invention as recited in independent Claim 88, the present invention relates to a recording control apparatus for controlling recording of images in a recording medium, including a storage section and comprising indicating and control sections. The storage section uses at least the recording medium for storing a plurality of reproducible images and a reproduction instruction file containing instruction information including at least one file name specifying at least one image to be reproduced, the reproduction instruction file being separate from the plurality of images. The indicating section indicates deletion of at least one of the plurality of reproducible images stored in the recording section. The control section controls deletion of the instruction information in the reproduction instruction file corresponding to the at least one image indicated by said indication section to be deleted if instruction information corresponding to the at least one image is stored in the reproduction instruction file.

In operation, image information for a particular reproducible image, stored in the reproduction instruction file, is deleted when the at least one of the plurality of reproducible images instructed to be deleted by said instruction section is specified in the reproduction instruction file to be reproduced. Consequently, because the information corresponding to the image in the reproduction instruction file is deleted before the reproduction control file is

recorded, the problems associated with the content of the reproduction control file not coordinated with the image data are addressed.

Independent Claims 92 and 93 correspond generally to Claim 88 and recite similar features in method and computer readable code forms, respectively.

Applicant submits that the cited art fails to anticipate at least the aforesaid features. As a result, the cited art fails to achieve the advantages provided by the present invention recited in independent Claims 80 and 88, as well as the independent claims that correspond to these claims. Moreover, Applicant submits that there are differences between the subject matter sought to be patented and the cited art, such that the subject matter taken as a whole would not have been obvious at the time the invention was made to one of ordinary skill in the art.

Parulski, et al. relates to an electronic still camera which can categorize images according to the subject matter. However, Parulski, et al. does not disclose or suggest reproducing an image, or deleting image information, based on information that: (1) is separate from the image to be reproduced; or (2) contains at least one file name specifying at least one image to be reproduced. Instead, Parulski, et al. is read to teach saving preselected category information with the stored file and saving the category information in header files (24(b)). In contrast, independent Claim 80 recites features of (i) a storage section using a recording medium storing a plurality of reproducible images and a reproduction control file separate from plurality of images containing at least one file name specifying at least one image to be reproduced, (ii) a reading section to read the reproduction instruction file, and (iii) a reproduction control section that controls reproduction of the reproducible images by reading the image specified by the reproduction instruction file read by the reading section, wherein reproduction is not performed

for a particular reproducible image of the at least one image to be reproduced if said reproduction control section determines that the particular image to be reproduced is not recorded in the recording medium, and is performed if a next reproducible image is specified by the reproduction instruction file and said reproduction control section determines that the next reproducible image is recorded in the recording medium. Also in contrast to Parulski, et al., independent Claim 88 recites features of (i) an indication section for indicating deletion of at least one of the plurality of reproducible images stored in the recording section and (ii) a control section for controlling deletion of the instruction information in the reproduction instruction file corresponding to the at least one image indicated by said indication section to be deleted if instruction information corresponding to the at least one image is stored in the reproduction instruction file. Indeed, Parulski, et al. is silent as to either of the aforesaid features because the purpose of the Parulski, et al. category information is merely to classify the associated stored image for convenient downloading. Therefore, Parulski, et al. does not meet at least the aforesaid features of the present invention.

Kurihara, et al. relates to an image recording apparatus with memory means to store data and is cited merely for its alleged teaching of an alarm display when a memory data overflow signal is detected. Applicant respectfully submits that Kurihara, et al. fails to add anything that would remedy the aforesaid deficiencies of Parulski, et al.

The remaining cited art also is not read to disclose or suggest at least the aforesaid features of the present invention fails or to add anything to the teachings of Parulski, et al. that would remedy the aforesaid deficiencies.

Accordingly, Applicant submits that independent Claims 80 and 88 patentably define the invention over the cited art. In addition, for reasons similar to those for independent

Claims 80 and 88, independent Claims 86, 87, 88, 92 and 93 are also allowable. Further, Claims 81-85 and 89-91 being dependent claims of allowable base claims also should be allowable for the same reasons as the base claims and further due to the additional features they recite.

Applicant believes that the present Amendment is responsive to each of the points raised by the Examiner in the Official Action, and submits that the present application is in allowable form. Favorable consideration of the claims and passage to issue of the present application at the Examiner's earliest convenience earnestly are solicited.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Michael Kondoudis", is written over a horizontal line.

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